

W | M | D



June 23, 2025

By ECF

The Honorable Katherine Polk Failla  
United States District Court for the Southern District of New York  
40 Foley Square, Courtroom 618  
New York, New York 10007

Re: *Dinosaur Financial Group LLC et al. v. S&P Global, Inc. et al.*, No. 22-cv-1860

**Subject: Plaintiffs' letter motion pursuant to Fed. R. Civ. P. 37(c)**

Dear Judge Failla:

We represent Plaintiffs Hildene Capital Management, LLC, Dinosaur Financial Group LLC, and Swiss Life Capital Management (collectively “Plaintiffs”). Plaintiffs are filing today their motion to preclude Defendants from denying that the data produced by FactSet Research Systems, Inc. and S&P Global, Inc. are a complete and accurate record of the actual license fees paid by Plaintiffs and members of the class under Rule 37(c). Pursuant to the Protective Order (ECF No. 125) and Rule 9 of this Court’s Individual Rules of Civil Procedure (“Rule 9”), Plaintiffs request permission to file their motion in partially redacted form and seal documents attached as Exhibits H, I, J, K, and L to the motion (“Sealed Exhibits”).

In accordance with Rule 9, Plaintiffs are filing: (i) a redacted version of their motion with Sealed Exhibits; and (ii) a copy of the motion with proposed redactions highlighted and exhibits in selected view. Pursuant to Rule 9.B.ii., Plaintiffs will also email Chambers with copies of these documents.

Plaintiffs’ motion and Sealed Exhibits contain, paraphrase or quote “Discovery Material” that has been designed as “Protected Material” by Defendants under the Protective Order. (ECF No. 125). The redacted portions of Plaintiffs’ motion and the Sealed Exhibits do not contain information concerning Plaintiffs, and Plaintiffs take no position on whether those documents should appropriately be deemed confidential. Plaintiffs are seeking permission to seal this material to comply with the Protective Order and Rule 9. Plaintiffs reserve the right to challenge Defendants’ confidentiality designations as appropriate.

Respectfully submitted,

/s/ Ronald J. Aranoff

Ronald J. Aranoff

Lyndon M. Tretter

/s/ Leiv Blad

Leiv Blad

Jeffrey Blumenfeld

Reuben B. Bauer  
WOLLMUTH MAHER & DEUTSCH LLP  
500 Fifth Avenue, 12th Floor  
New York, New York 10110  
Telephone: (212) 382-3300  
Email: raranoff@wmd-law.com  
ltretter@wmd-law.com  
rbauer@wmd-law.com

Meg Slachetka  
COMPETITION LAW PARTNERS PLLC  
1101 Pennsylvania Ave., NW  
Washington, DC 20004  
Telephone: (202) 742-4300  
Email: leiv@competitionlawpartners.com  
jeff@competitionlawpartners.com  
meg@competitionlawpartners.com

/s/ Robert N. Kaplan  
Robert N. Kaplan  
Gregory K. Arenson  
Elana Katcher  
KAPLAN FOX & KILSHEIMER LLP  
850 Third Ave., 14th Floor  
New York, NY 10022  
Telephone: (212) 687-1980  
Email: rkaplan@kaplanfox.com  
garenson@kaplanfox.com  
ekatcher@kaplanfox.com

Cc: Counsel of record (*via ECF*)